

# EXHIBIT 4

**From:** [Peter Gentala](#)  
**To:** [evan@fray-witzer.com](mailto:evan@fray-witzer.com); [Joshua Salley](#); [vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com); [Evan@CFWLegal.com](mailto:Evan@CFWLegal.com); [hmetcalfe@malawfirm.com](mailto:hmetcalfe@malawfirm.com)  
**Cc:** ["Tyler Thompson"](#); ["Casonya Ritchie"](#); ["Liz Shepherd"](#); ["Chad Propst"](#); [J Edward Bell](#); [Ryan Heiskell](#); [Mikahlia Lawrence](#); [Gabrielle Anna Sulpizio](#); [Candice Neves](#); [Dani Pinter](#); [Eric Flynn](#)  
**Subject:** Re: Jane Does 1 - 9 v. Hammy Media Entities - Wisebits IP 30(b)(6) deposition  
**Date:** Tuesday, February 27, 2024 7:49:35 PM

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Hi Evan,

We believe plaintiffs' statement regarding keeping the deposition open is proper considering that in last week's deposition--and also in the earlier one from Hammy Media--there was a consistent pattern of the witness either not being prepared, not being knowledgeable, or outright refusing to answer questions. Neither witness met the basic requirements of rule 30(b)(6) and we intend to seek compliant depositions.

We agree that the meet and confer requirement as to this issue is met but are happy to discuss further, particularly if you are willing to discuss scheduling new depositions.

Thank you.

Best,

Peter

**Peter Gentala**  
Senior Legal Counsel  
**National Center on Sexual Exploitation Law Center**  
Office: (202) 393-7245  
[pgentala@ncoselaw.org](mailto:pgentala@ncoselaw.org) | [EndSexualExploitation.org](https://EndSexualExploitation.org)  
[1201 F St NW, Suite 200, Washington, DC 20004](#)



NATIONAL CENTER ON SEXUAL EXPLOITATION  
[EndSexualExploitation.org](https://EndSexualExploitation.org)

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**From:** [evan@fray-witzer.com](mailto:evan@fray-witzer.com) <[evan@fray-witzer.com](mailto:evan@fray-witzer.com)>  
**Date:** Tuesday, February 27, 2024 at 3:55 PM  
**To:** 'Joshua Salley' <[jsalley@belllegalgroup.com](mailto:jsalley@belllegalgroup.com)>, [vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com) <[vgurvits@bostonlawgroup.com](mailto:vgurvits@bostonlawgroup.com)>, [Evan@CFWLegal.com](mailto:Evan@CFWLegal.com) <[Evan@CFWLegal.com](mailto:Evan@CFWLegal.com)>,

hmetcalfe@malawfirm.com <hmetcalfe@malawfirm.com>

**Cc:** 'Tyler Thompson' <tthompson@kytrial.com>, 'Casonya Ritchie' <critchie@kytrial.com>, 'Liz Shepherd' <lshepherd@kytrial.com>, 'Chad Propst' <cpropst@kytrial.com>, 'J Edward Bell' <jeb@belllegalgroup.com>, 'Ryan Heiskell' <RHeiskell@belllegalgroup.com>, 'Mikahlia Lawrence' <mlawrence@belllegalgroup.com>, 'Gabrielle Anna Sulpizio' <gsulpizio@belllegalgroup.com>, 'Candice Neves' <cneves@belllegalgroup.com>, Peter Gentala <pgentala@ncoselaw.org>, Dani Pinter <dpinter@ncoselaw.org>, 'Eric Flynn' <EFlynn@belllegalgroup.com>

**Subject:** Jane Does 1 - 9 v. Hammy Media Entities - Wisebits IP 30(b)(6) deposition

Hello all –

Given counsel's statement at the end of Wisebits' 30(b)(6) deposition last week that Plaintiffs were reserving their right to move the court to reconvene the deposition based on the witness declining to answer certain questions (which we believe to have been outside the scope of the deposition), it is our intent to file a Motion for Protective Order tomorrow to have the deposition ruled closed.

If Plaintiffs are NOT going to seek to reconvene the deposition, please let us know that as soon as possible so that we may avoid unnecessary motion practice.

Also, given the on-the-record discussions of the issue, we assume that we can consider whatever meet and confer requirement that might otherwise exist to have been met. If you disagree on this point, please let us know that as well as soon as possible so that we can set up a time tomorrow to meet and confer before we file our motion.

Thank you.

Evan

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Evan Fray-Witzer  
Ciampa Fray-Witzer, LLP  
20 Park Plaza, Suite 505  
Boston, MA 02116  
(617) 426-0000  
(617) 507-8043 (facsimile)  
[Evan@CFWLegal.com](mailto:Evan@CFWLegal.com)